



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 25 2012

REPLY TO THE ATTENTION OF:

VIA CERTIFIED MAIL

Doug Harris  
General Manager  
Veolia Environmental Services  
#7 Mobile Avenue  
Sauget, Illinois 62201

Re: EPA Conditional Approval of Confirmatory Performance Test Plan and Continuous Monitoring System Performance Evaluation Test Plan at Veolia's Sauget, Illinois Facility's Incinerators 2, 3 and 4 under the National Emissions Standards for Hazardous Waste Combustors at 40 C.F.R. Part 63, Subpart EEE

Dear Mr. Harris:

On April 13, 2012, Veolia submitted a confirmatory performance test plan to the U.S. Environmental Protection Agency. By this letter, EPA approves Veolia's April 13, 2012 confirmatory performance test plan provided it does not deviate from SW-846 Method 0023A, except that EPA approves the request to deviate from the carbon monoxide testing parameters, as explained below. This approval is also contingent on Veolia operating Unit 4 during the test with a carbon injection rate between 6.6 and 6.8 lb/hr, which is the rate between the operating parameter limit in Veolia's applicable Notice of Compliance and the average of the injection rate over the previous 12 months. See 40 C.F.R. § 63.1207(g)(2)(ii).

40 C.F.R. § 63.1207(g)(2)(i through v) specifies the operating conditions under which Veolia must conduct the confirmatory performance test. Pursuant to 40 C.F.R.

§ 63.1207(g)(2)(i), Veolia must conduct the confirmatory performance test while the carbon monoxide emission concentration is between the average concentration during the 12 months prior to the confirmatory performance test and 100 parts per million by volume dry basis and corrected to 7 percent oxygen (ppmV @ 7% oxygen), the emission standard set forth in 40 C.F.R. § 63.1219(a)(5)(i). Pursuant to 40 C.F.R.

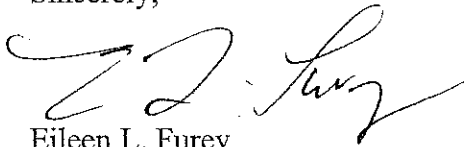
§ 63.1207(g)(2)(v), EPA may approve an alternative range to that required by 40 C.F.R. § 63.1207(g)(2)(i) if Veolia documents in the confirmatory performance test plan that it may be problematic to maintain the required range during the test. In Table 4.1 of the confirmatory performance test plan for incinerators 2, 3 and 4, Veolia stated that the average carbon monoxide concentrations during the year prior to the confirmatory performance test were 1.66 ppmV @ 7% oxygen, 1.52 ppmV @ 7% oxygen, and 1.18 ppmV @ 7% oxygen, respectively. EPA is aware that Veolia does not and cannot

target a carbon monoxide emission concentration in the same way that it can target a particular total waste feed rate or electrostatic precipitator inlet temperature. Consequently, EPA approves Veolia's request for the alternate carbon monoxide range of 0 to 5 ppmV @ 7% oxygen.

EPA would also like to note that 40 C.F.R. § 63.1207(d)(1) requires that you must commence a Comprehensive Performance Test (CPT) no later than 61 months after the date of commencing the previous CPT used to show compliance. Because you commenced your previous CPT in August 2008, EPA expects to see your CPT plan by August 2012, one year prior to your testing deadline of August 2013, as required by 40 C.F.R. § 63.1207(e)(i). In its August 2012 CPT plan submittal, EPA requests that Veolia include a protocol for testing all required parameters concurrently in order to demonstrate compliance with the emission standards provided by this subpart as required by 40 C.F.R. § 63.1207(b)(1).

If you have any questions regarding this letter, please contact Ms. Shannon Downey, of my staff, at [downey.shannon@epa.gov](mailto:downey.shannon@epa.gov) or (312) 353-2151.

Sincerely,



Eileen L. Furey  
Acting Chief  
Air Enforcement and Compliance Assurance Branch

cc: Ray Pilapil, Manager  
Compliance and Systems Management Section  
Bureau of Air  
Illinois Environmental Protection Agency